

EXHIBIT 7

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
MDL-NO. 16-2738 (FLW) (LHG)

IN RE: JOHNSON & JOHNSON

TALCUM POWDER PRODUCTS

ORAL DEPOSITION OF:

MARKETING, SALES PRACTICES,

DANIEL L.
CLARKE-PEARSON, MD

AND PRODUCTS LIABILITY

VOLUME 1

LITIGATION

* * * *

THURSDAY, AUGUST 26, 2021

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Certified Court Reporting & Videoconferencing

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1 And if you turn to the next page, you
2 have a slide, this is page 17 of the document and 34
3 of the slide deck, you have a slide devoted to risk
4 factors for ovarian cancer, right?

5 **A. Yes.**

6 Q. And we already saw earlier in your
7 presentation that you defined risk factors as
8 anything that can increase a women's risk of ovarian
9 cancer, right?

10 **A. Right.**

11 Q. And here the first bullet you have is
12 hereditary risk factors, right?

13 **A. Yes.**

14 Q. BRCA1 and BRCA2 gene mutations, right?
15 What are you writing?

16 **A. I'm just making a few additional notes.**

17 **You're welcome to look at them.**

18 Q. So, you can tell me what they are when
19 we're done.

20 **A. Sure.**

21 Q. I'm going to guess that you're adding
22 some other risk factors that are not --

23 **A. Yeah, there are a lot of risk factors
24 that we didn't list here.**

25 Q. You did list hereditary, right?

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1 **A.** **Yes.** That's important for women to be
2 aware of their family history and knowing that that's
3 the most significant risk factor.

4 **Q.** And you did list age, correct?

5 **A.** **Yes.**

6 **Q.** And you did list obesity, right?

7 **A.** **Yes.**

8 **Q.** And you did list nulliparity, right?

9 **A.** **Yes.**

10 **Q.** You did list a family history of
11 breast, ovarian or colon cancer, right?

12 **A.** **Yes.**

13 **Q.** You did list personal history of breast
14 cancer, right?

15 **A.** **Right.**

16 **Q.** You did not list perineal use of talc?

17 **A.** **And there is a good number of other**
18 **risk factors that I didn't list as well. Including**
19 **polycystic ovarian syndrome, pelvic inflammatory**
20 **disease, IUD use, endometriosis. We didn't mention**
21 **Lynch syndrome in the hereditary which is also very**
22 **important. So there is a number of risk factors that**
23 **were not listed.**

24 BY MS. BROWN:

25 **Q.** By February of 2021, you had been

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1 Secondly, she has no past history that
2 would suggest [REDACTED], that [REDACTED] is,
3 often times, associated with [REDACTED]
[REDACTED], none of that that
5 might suggest [REDACTED]. And, in fact, at the
6 time [REDACTED], no evidence of [REDACTED] was
7 found elsewhere in [REDACTED]
[REDACTED].

9 The frozen section report is of no
10 significance at all. It's not quite correct is the
11 best I can tell you, but it has nothing to do with
12 [REDACTED].

13 Q. You disagree with her treating
14 physician, Dr. Schwartz's testimony, that he believed
15 it's likely her [REDACTED] arose in an [REDACTED]
16 [REDACTED]?

17 MS. THOMPSON: Objection.

18 THE WITNESS: I don't disagree with
19 him. It's possible that -- we know that
20 [REDACTED]
[REDACTED], so I would agree that that's
22 what Dr. Schwartz is saying. But, in fact, she
23 doesn't have [REDACTED].

24 BY MS. BROWN:

25 Q. But you didn't look at any of her

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1 pathology under the microscope yourself?

2 **A. I didn't look myself. But the**
3 **pathology report, which is quite thorough from a**
4 **renowned institution, makes no reference to**
5 **[REDACTED] being identified.**

6 Q. And you didn't ask to speak to Dr.

7 Schwartz about why it is that he testified under oath
8 that he thinks it's likely Ms. Converse's [REDACTED] arose
9 in an [REDACTED], right?

10 **A. I don't need to talk to Dr. Schwartz**
11 **about that. I understand what he's saying.**

12 Q. But do you think in terms of who has
13 more information about the medical history regarding
14 Ms. Converse, Dr. Schwartz probably has more than you
15 do?

16 MS. THOMPSON: Objection.

17 THE WITNESS: Based on his opinion at
18 the time of surgery, which is the question in your
19 deposition -- of his deposition, his interpretation
20 at the time of surgery based on [REDACTED]
[REDACTED], which was not correct, I won't disagree with
22 him that's what he thought at the time.

23 BY MS. BROWN:

24 Q. If Ms. Converse had [REDACTED], can
25 you agree that increased her risk for [REDACTED]